

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Dennis Starkey, Jacquelyn Starkey, A.S., a minor and M.S., a minor, Plaintiffs v. York County, M. Steve Chronister, Christopher B. Reilly, Doug Hoke, York County Office of Children, Youth and Families, Deb Chronister, Joan Hedgcock and Katie Gladfelter- Watts, Defendants	CIVIL ACTION - LAW NO: 1:11-cv-00981 (Honorable John E. Jones, III) JURY TRIAL DEMANDED (ELECTRONICALLY FILED)
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**PETITION TO APPROVE COMPROMISE
AND SETTLEMENT OF MINORS' CLAIM**

AND NOW, Plaintiffs, Dennis Starkey, Jacquelyn Starkey, A.S., a Minor and M.S., a Minor ("Plaintiffs"), file this Petition to Approve the Compromise and Settlement of Minors' Claims. In support of this Petition, Plaintiffs aver as follows:

1. Plaintiffs Dennis Starkey and Jacquelyn Starkey are the parents and natural guardians of the Minors, A.S. and M.S. (the "Minors").
2. Plaintiffs and Minors reside together at 227 Dew Drop Road, York County, Pennsylvania 17403.
3. A.S. was born in February 2010 and is currently 3 years old.

4. M.S. was born in August 2007 and is currently 6 years old.

5. This Petition is filed to obtain approval of the compromise of litigation concerning an incident as set forth in the Amended Complaint filed in this action.

6. On behalf of the Defendants, an offer to compromise this claim in the amount of \$150,000.00 was communicated and accepted by the Plaintiffs, through their counsel.

7. Plaintiffs believe that this offer is fair and in the best interest of the Minor.

8. The settlement fund of \$150,000.00 is requested to be distributed as follows:

Settlement Amount	\$150,000.00
Legal Fee	\$ 72,370.74
Out-of-Pocket Expenses	\$ 5,258.53
Pending Health Insurance Lien	\$ 0
Net to Clients	\$ 72,370.73

9. Plaintiffs ask that the Court approve the following distribution between the Minors and their Parents:

a.	to Dennis Starkey and Jacquelyn Starkey	\$ 68,370.73
b.	to Dennis Starkey and Jacquelyn Starkey	
	in trust for A.S., a Minor	\$ 2,000.00

c. to Dennis Starkey and Jacquelyn Starkey

in trust for M.S. , a Minor \$ 2,000.00

10. Plaintiffs understand that the settlement funds will be placed in a restricted, federally insured account, with no withdrawals from the account until said Minors reach the age of majority, unless previously authorized by Court Order.

11. Additionally, Plaintiffs request that they be authorized and directed to execute a Full and Final General Release of all claims against Defendants on the terms agreed to by the parties

12. Therefore, Plaintiffs respectfully request this Honorable Court approve this proposed settlement.

WHEREFORE, Plaintiffs, Dennis Starkey, Jacquelyn Starkey, A.S., a Minor and M.S., a Minor, respectfully request that this Honorable Court enter an Order compromising this action, approving the proposed settlement, authorizing and directing Plaintiffs to execute a Full and Final Release, and authorizing and directing Plaintiffs to file a discontinuance of record.

Respectfully submitted,

Dated: Sept. 25, 2013

By: /s/ Mark D. Freeman
Mark D. Freeman, Esquire
PO Box 457
Media, PA 19063
Phone: 610.828.1525
Fax: 610.828.1769
iamfree1961@msn.com

CERTIFICATE OF CONCURRENCE

I, Mark D. Freeman, Esq., certify that Counsel for Defendants, David Schwalm, Esq., communicated with Plaintiffs' attorney on September 25, 2013, that the Defendants concur in the attached Petition to Approve Compromise and Settlement of Minor's Claims.

Dated: Sept. 25, 2013

By: /s/ Mark D. Freeman

CERTIFICATE OF SERVICE

I, Mark D. Freeman, Esquire, hereby state that a true and correct copy of the foregoing document(s) was served upon all counsel of record in the manner and on the date set forth below:

By the Middle District Court via Electronic Filing:

David L. Schwalm, Esquire

dschwalm@tthlaw.com

Dated: Sept. 25, 2013

By: /s/ Mark D. Freeman